

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

JOHN DOES 151-166,

Case No. 2:20-cv-03817

Plaintiffs,

)
Judge Michael H. Watson

v.

)
Chief Magistrate Judge Elizabeth P.
Deavers

THE OHIO STATE UNIVERSITY,

Defendant.

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)

**[PROPOSED] ORDER GRANTING PLAINTIFF'S UNOPPOSED MOTION
FOR LEAVE TO PROCEED ANONYMOUSLY**

At the request of the plaintiffs and with defendant's non-opposition (ECF No. 5), it is

ORDERED as follows:

1. Within seven (7) days of the date of this Order, plaintiffs will disclose the true identities of John Doe plaintiffs 151-166, and the identities of any future plaintiffs, to the attorneys representing Defendant The Ohio State University ("Ohio State") in this case:

- (1) Michael H. Carpenter, Trial Attorney, Special Counsel, Carpenter Lipps & Leland LLP, Columbus, Ohio;
- (2) Timothy R. Bricker, Special Counsel, Carpenter Lipps & Leland LLP;
- (3) David J. Barthel, Special Counsel, Carpenter Lipps & Leland LLP;
- (4) Stephen E. Dutton, Special Counsel, Carpenter Lipps & Leland LLP.

2. The attorneys listed above in paragraph 1 may disclose the identities of the John Doe plaintiffs, and the identities of any future plaintiffs, to (a) the immediate legal staff involved in this litigation, Case No. 2:20-cv-03817, and related Case Nos. 2:18-cv-00692, 2:18-cv-00736, 2:19-cv-01911, 2:19-cv-02237, 2:19-cv-02429, 2:19-cv-02462, 2:19-cv-03165, 2:19-cv-04433, 2:19-cv-04397, 2:19-cv-04441, 2:19-cv-04624, 2:19-cv-04634, 2:19-cv-04746, 2:19-cv-04902,

2:19-cv-05272, 2:19-cv-05418, 2:19-cv-5551, 2:20-cv-01188, No. 2:20-cv-01385, 2:20-cv-01429, 2:20-cv-01551, 2:20-cv-02008, 2:20-cv-01649, 2:20-cv-02574, and 2:20-cv-03817; (b) witnesses on a “need to know” basis; and (c) the following individuals at Ohio State:

- (1) Anne Garcia, Interim Vice President and General Counsel, Office of Legal Affairs, The Ohio State University; Vice President for Wexner Medical Center Legal and Compliance and Senior Associate General Counsel, Office of Legal Affairs, The Ohio State University;
- (2) Paula Luna Paoletti, Senior Assistant Vice President and Senior Associate General Counsel, Office of Legal Affairs, The Ohio State University;
- (3) Mary Menkedick Ionno, Assistant Vice President & Senior Associate General Counsel, Office of Legal Affairs, The Ohio State University;
- (4) Haily Miller, Legal Fellow, The Ohio State University Wexner Medical Center;
- (5) Anne Schira, Director of Strategic Initiatives and Special Assistant to the Senior Vice President, Office of Legal Affairs, The Ohio State University;
- (6) Mark Lemmon, Paralegal, Office of Legal Affairs, The Ohio State University;
- (7) Chris Glaros, Assistant Vice President for Compliance Operations and Investigations, Office of University Compliance and Integrity, The Ohio State University;
- (8) Kellie Brennan, Compliance Director and Title IX Coordinator, Office of Institutional Equity, The Ohio State University;
- (9) Amy Golian, Senior Assistant Vice President & Senior Associate General

Counsel, Office of Legal Affairs, The Ohio State University; and

(10) Katherine M. Lasher, Associate Vice President, Office of Institutional
Equity, The Ohio State University.

3. The individuals listed above in paragraph 2 may disclose the identity of the John Doe plaintiffs, and the identities of any future plaintiffs, to their immediate legal staff involved in this litigation, Case No. 2:20-cv-03817, and related Case Nos. 2:18-cv-00692, 2:18-cv-00736, 2:19-cv-01911, 2:19-cv-02237, 2:19-cv-02429, 2:19-cv-02462, 2:19-cv-03165, 2:19-cv-04433, 2:19-cv-04397, 2:19-cv-04441, 2:19-cv-04624, 2:19-cv-04634, 2:19-cv-04746, 2:19-cv-04902, 2:19-cv-05272, 2:19-cv-05418, 2:19-cv-5551, 2:20-cv-01188, No. 2:20-cv-01385, 2:20-cv-01429, 2:20-cv-01551, 2:20-cv-02008, 2:20-cv-01649, 2:20-cv-02574, and 2:20-cv-03817.

4. Ohio State does not waive, but expressly reserves, the right to identify additional individuals who have a “need to know” the identity of John Doe plaintiffs or any future plaintiffs.

5. The parties will discuss and attempt to resolve any question as to which witnesses or additional individuals “need to know” the identities of John Doe plaintiffs or the identities of any future plaintiffs. If the parties are unable to agree upon which witnesses or additional individuals “need to know,” the parties will seek the Court’s assistance.

6. All individuals to whom the identities of John Doe plaintiffs or the identities of any future plaintiffs are disclosed agree not to divulge, purposefully or inadvertently, the identities of John Doe plaintiffs or the identities of any future plaintiffs, except as set forth in this Order.

IT IS SO ORDERED.

Date: _____

ELIZABETH A. PRESTON DEAVERS
CHIEF UNITED STATES MAGISTRATE JUDGE